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TO:
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FROM:
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RE: Pending regulations for Ma Huang / Ephedra

1. When I originally started ordering chinese herbs from my supplier, they made sure I was a competent trained practitioner of oriental medicine, a graduate from a recognized chinese medicine school. That was in 1995.
2. The Chinese have safely used Ma Huang for 5,000 years in the treatment of asthma and related conditions. It was the American physicians who quickly developed medicinals when ephedrine was isolated as the active ingredient with synthetics. (Tyler, V. Herbs of Choice, 1994, p. 88)
3. "...the fact that the plant (ma huang) serves only as a minor source of the alkaloid (ephedrine), restricting the availability of the herb, though well intended, seems an excessive measure" (ibid, p 89).
4. I recognize that I am not a chemist; however, it is my training and understanding that plant herbs when prepared in the form of the plant has a synergetic effect of the whole plant thus making the plant medicinal much less toxic than if the "active ingredient" of the plant is made synthetically as is done in many OTC nasal sprays (in the case of ephedrine) thus, chinese medicinals as a whole as well as Ma Huang / Ephedra are much more safe than what can be found OTC in the aisles of Walgreens or Rite Aid.
5. Chinese Patent herbs are formulations which have been prepared together whether in the US or in China and do not contain synthetic active ingredients, thus making them very safe.
6. Any herb, medicinal, OTC product can be overused, abused, or used for that which it is not intended. You cannot legislate or regulate the behavior of people in this regard.
7. I implore, in the name of common sense, please keep Ma Huang / Ephedra on the open market so that practitioners have access to the herbs which are of such benefit to our patients.
8. I also think, that before the FDA makes any severe and restrictive regulations they consult with the chinese medicine / oriental medicine community of practitioners / experts before they consult with "scientists" or "doctors" as these populations may have their personal/professional agendas to satisfy and they lack training in the use of chinese medicinals.
9. I do appreciate the concern of FDA to make America safe when it comes to medicinals and the on going work to determine interactive effects. Thank you for considering my input.


Patricia Worth, Illinois State Acupuncture Association, Continuing Education Chair
cc: American Association of Oriental Medicine Fax: 610-264-2768

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